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listed in signature blocks below*

**UNITED STATE DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-cv-4688-RS

**STIPULATION AND [PROPOSED]
ORDER TO RESCHEDULE MOTION
TO DISMISS HEARING**

Judge: Hon. Richard Seeborg
Action Filed: July 14, 2020
Trial Date: Not Set
Place: Courtroom 3 – 17th Floor

Pursuant to the Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, Julieanna Muniz, Eliza Cambay, Sal Cataldo, Emir Goenaga, Julian Santiago, Harold Nyanjom, Kellie Nyanjom, and Susan Lynn Harvey (“Plaintiffs”) and Defendant Google LLC (“Google”), by and through their respective counsel, hereby stipulate and agree to the following:

WHEREAS, Plaintiffs filed their Amended Complaint on November 11, 2020;

WHEREAS, Google filed a Motion to Dismiss Plaintiffs’ Amended Complaint on December 17, 2020;

WHEREAS, the deadline for Plaintiffs to file any opposition to Google’s Motion to Dismiss is January 14, 2021;

WHEREAS, the deadline for Google to file any reply is February 4, 2021;

WHEREAS, on December 1, 2020, the Court set the hearing on any motion to dismiss for February 25, 2021, at 1:30 p.m.;

WHEREAS, counsel for Plaintiffs have a conflict on that hearing date for the following reasons;

1. Counsel for Plaintiffs represent individuals in an earlier-filed action against Google currently pending before the Hon. Lucy H. Koh. *See Brown v. Google LLC*, Case No. 20-cv-03664-LHK (N.D. Cal.);
2. On October 15, 2020, Google filed a Motion to Dismiss in the *Brown* litigation, noticing the Motion for a hearing before Judge Koh on February 25, 2021, at 1:30 p.m. *See Brown v. Google LLC*, Case No. 20-cv-03664-LHK (N.D. Cal.) (Dkt. No. 82);

NOW THEREFORE, the Parties stipulate and respectfully request that the Court re-set the February 25, 2021, hearing date to February 18, 2021 or March 4, 2021.

1 DATED: January 4, 2021

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DATED: January 4, 2021

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Attorneys for Defendant Google LLC

ATTESTATION

I, Amanda Bonn, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: January 4, 2021

By: /s/ Amanda Bonn
Amanda Bonn

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the hearing currently set for February 25, 2021, at 1:30 p.m. is hereby continued to _____.

Date: _____

Hon. Richard Seeborg
United States District Judge